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Attorneys for Plaintiff-Relator
Jonathan Faulkner

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

UNITED STATES OF AMERICA,
 	
                    Plaintiff,
 	
                    Ex. rel.
 	
JONATHAN FAULKNER,
 	
                    Plaintiff-Relator.
 	
        v.
 	
THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY,
 	
                    Defendant.
	Case No. 20-cv-00636-VKD
	
	FRCP RULE 41 STIPULATION FOR DISMISSAL WITH PREJUDICE AND ORDER THEREON
	
	 Re: Dkt. No. 69

STIPULATION

WHEREAS, Plaintiff-Relator JONATHAN FAULKNER ("Plaintiff-Relator"), wishes to

dismiss this action <u>with prejudice</u> in exchange for a waiver of collectible costs by Defendant THE

BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY

("Defendant");

WHEREAS, Defendant is willing to accept said dismissal by Plaintiff-Relator <u>with</u>

FRCP RULE 41 STIPULATION FOR
DISMISSAL WITH PREJUDICE AND
ORDER THEREON

302180.00001/152564986v.2

prejudice and is willing to waive all costs in exchange;

WHEREAS, Plaintiff the UNITED STATES OF AMERICA ("Plaintiff") has advised that it will consent to the dismissal of Defendant so long as the dismissal is without prejudice as to Plaintiff only;

WHEREAS, Defendant is willing to accept that said dismissal is without prejudice as to Plaintiff only.

THEREFORE, IT IS STIPULATED by and between the parties hereto through their respective counsel that pursuant to Federal Rules of Civil Procedure Rule 41(a) this matter be dismissed pursuant to the terms outlined above and with permission of the Court.

Dated: February 2, 2025

Plaintiff-Relator
Jonathan Faulkner

Dated: February 2, 2025

GROCHOW LAW

Lauren E. Grochow
Daniel M. Kalinowski
Kevin J. Grochow

Attorneys for Plaintiff-Relator
Jonathan Faulkner

Dated: February 2, 2025

BLANK ROME LLP

Cheryl S. Chang
Dominique L. Casimir
Luke W. Meier
Attorneys for Defendant
The Board of Trustees of the Leland
Stanford Junior University

1   prejudice and is willing to waive all costs in exchange;

2   WHEREAS, Plaintiff the UNITED STATES OF AMERICA ("Plaintiff") has advised that

3   it will consent to the dismissal of Defendant so long as the dismissal is without prejudice as to

4   Plaintiff only;

5   WHEREAS, Defendant is willing to accept that said dismissal is without prejudice as to

6   Plaintiff only.

7   THEREFORE, IT IS STIPULATED by and between the parties hereto through their

8   respective counsel that pursuant to Federal Rules of Civil Procedure Rule 41(a) this matter be

9   dismissed pursuant to the terms outlined above and with permission of the Court.

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    Dated: February 2, 2025

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                                                                    _____
12   Plaintiff-Relator
                                                                    Jonathan Faulkner
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    Dated: February 2, 2025   GROCHOW LAW
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                                                         _s/ Kevin J. Grochow_____
15   Lauren E. Grochow
                                                       Daniel M. Kalinowski
16   Kevin J. Grochow
                                                       Attorneys for Plaintiff-Relator
17   Jonathan Faulkner

18 Dated: February 2, 2025   BLANK ROME LLP

19   _s/ Cheryl S. Chang_____
                                                       Cheryl S. Chang
20   Dominique L. Casimir
                                                       Luke W. Meier
21   Attorneys for Defendant
                                                       The Board of Trustees of the Leland
22   Stanford Junior University

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24   In accordance with Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all of the

25   signatories listed on this Stipulation, and on whose behalf this stipulation is

26   submitted, concur in the Stipulation's content and have authorized its filing.

27   _s/ Kevin J. Grochow_____

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                                                       FRCP RULE 41 STIPULATION FOR
                          - 2 -   DISMISSAL WITH PREJUDICE AND
                                                       ORDER THEREON

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ORDER

2   PURSUANT TO STIPULATION OF THE PARTIES AND GOOD CAUSE

3   APPEARING THEREFOR, IT IS ORDERED that the above-entitled action and Defendant

4   named in the First Amended Complaint on file herein is dismissed <u>with prejudice</u> as to Plaintiff-

5   Relator Jonathan Faulkner, and <u>without prejudice</u> as to Plaintiff the United States of America,

6   pursuant to Federal Rules of Civil Procedure Rule 41(a).

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Dated: February 4, 2025

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9   _Virginia K. DeMarchi_
Virginia K. DeMarchi
United States Magistrate Judge

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